



October 30, 2023

**Via ECF and E-mail**

Hon. Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2103  
New York, NY 10007

**Re: *In re Tether and Bitfinex Crypto Asset Litigation*, 19-CV-09236 (KPF) –  
Letter Motion to File Redline Exhibit Under Seal**

Dear Judge Failla,

We represent Plaintiffs in the above-referenced action. Pursuant to the Court's Order dated October 27, 2023 (ECF No. 484), Plaintiffs submit a redline version of Plaintiffs' proposed Second Amended Consolidated Complaint filed at ECF No. 480-1 showing the differences between that document and Plaintiffs' Amended Consolidated Class Action Complaint (ECF No. 114).

Hon. Katherine Polk Failla  
October 30, 2023

Respectfully submitted,

/s/ Andrew R. Dunlap

Philippe Z. Selendy

Andrew R. Dunlap

Oscar Shine

SELENDY GAY ELSBERG PLLC

1290 Sixth Avenue

New York, NY 10104

pselendy@selendygay.com

adunlap@selendygay.com

oshine@selendygay.com

/s/ Todd M. Schneider

Todd M. Schneider (*pro hac vice*)

Matthew S. Weiler (*pro hac vice*)

Mahzad K. Hite (*pro hac vice*)

SCHNEIDER WALLACE COTTRELL

KONECKY LLP

2000 Powell Street, Suite 1400

Emeryville, CA 94608

tschneider@schneiderwallace.com

mweiler@schneiderwallace.com

mhite@schneiderwallace.com

*Interim Lead Counsel and Attorneys for  
Plaintiffs and the Proposed Class*

cc: All Counsel of Record (via ECF)